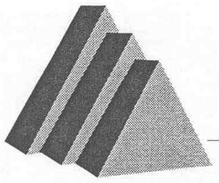

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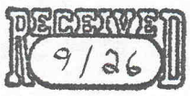

September 14, 2001

Robert L. Stephenson II, MPH
Director, Division of Workplace Programs, CSAP
5600 Fishers Lane
Rockwall II, Suite 815
Rockville, MD 20857

Dear Mr. Stephenson:

This letter is in response to the 21 August 2001 Federal Register announcement on proposed changes to the Mandatory Guidelines for Workplace Drug Testing Programs. I am the Responsible Person for the Clincal Laboratory Partners Toxicology Laboratory.

I would like to raise one issue regarding these proposals. Under Subpart B, section 14 (h2), (p. 43881), there is discussion on the need for a comfirmatory test for a specific oxidizing adulterant that uses a different analytical principle or chemical reaction than that used for the initial test unless a recognized reference method is used. Certainly this is a basic tenet of toxicology. However, it would be helpful to state what are the reference tests for specific gravity, pH, creatinine, nitrites, chromates, pH, etc. I presume that refractometry and the pH reference electrode are the reference tests for specific gravity and pH. What are the acceptable reference procedures for the other tests? If the alkaline picrate method for creatinine is not the reference method, what will be the alternative method? Currently, we repeat both the creatinine and nitrite tests using the same methodologies on the different aliquot of the sample. To use a second, different method will require more development effort in the lab. The same could be said for methods for detecting oxidizing adulterants. Some clarifications are needed before we can proceed with the new regulations if enacted.

Sincerely yours,

Alan Wu, Ph.D.
RP, CLP

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